

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE JUUL LABS, INC.,
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

Case No. 3:19-md-02913-WHO

**DECLARATION OF SARAH R. LONDON IN
SUPPORT OF FEE COMMITTEE'S TRIBAL
ALTRIA SETTLEMENT FEE AND
EXPENSE RECOMMENDATIONS AND
SECOND SUPPLEMENTAL EXPENSE
RECOMMENDATIONS**

This Document Relates to:

All Cases

1 I, Sarah R. London, declare and state as follows:

2 1. I am an attorney in the law firm of Lief, Cabraser, Heimann & Bernstein, LLP. I
3 serve as Co-Lead Counsel and Liaison Counsel in this litigation. I am a member of the State Bar
4 of California and am admitted to practice before this Court. I make this declaration based on my
5 own personal knowledge. If called upon to testify, I could and would testify competently to the
6 truth of the matters stated herein.

7 2. I submit this declaration in support of the Fee Committee's Tribal Altria
8 Settlement Fee and Expense Recommendations and Second Supplemental Expense
9 Recommendations.

10 **The Tribal Plaintiffs' Settlement with the Altria Defendants**

11 3. The personal injury, government entity, and class settlements with the Altria
12 Defendants reached during the *SFUSD* bellwether trial did not include the tribal Plaintiffs.

13 4. Those Plaintiffs continued litigating against Altria, including obtaining additional
14 document productions from the defendants, completing fact document and deposition discovery
15 for three bellwether plaintiffs, preparing bellwether expert reports, and defending expert
16 depositions.

17 5. This work was undertaken by the Tribal Leadership Committee, consisting of
18 Hobbs Straus, Lief Cabraser, Frazer Law, and Sonosky Chambers.

19 6. Three of these firms – Hobbs, LCHB, and Frazer – also each contributed \$250,000
20 to a tribal litigation fund to pursue the Altria-tribal cases without the need for any additional
21 contribution from the rest of the PSC.

22 7. As a result of those efforts, the tribal Plaintiffs reached a settlement of all litigation
23 tribal Plaintiff claims. That settlement is expected to generate, under CMO 5(A), maximum
24 common benefit fees of \$1,187,500 and common benefit costs up to \$475,000 (with the final
25 amounts subject to certain conditions).

26 8. The Tribal Leadership Committee recommended to the Court-appointed Fee
27 Committee how to allocate the fees and expenses derived from the settlement, recommendations
28 the Fee Committee accepted.

